

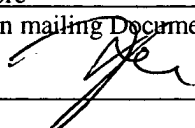
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Harold C. Moore

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Signature

July 23, 2009

Date of Signature

Re: Application of: Jagannathan et al.
Serial No.: 10/524,311
Filed: November 21, 2005
For: Method for Routing of Data Packets and
Routing Apparatus
Group Art Unit: 2446
Confirmation No.: 6425
Examiner: Shaq Taha
Docket No.: 1890-0188

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request. This request is being filed with a Notice of Appeal. The review is requested for the reasons stated on the attached sheets. This paper is filed by the Attorney of Record.

I. Reasons for Review

The Examiner has failed to establish that claims 18 and 20-37 are unpatentable over U.S. Patent No. 7,289,502 to Gemelli et al. (hereinafter “Gemelli”) in combination with U.S. Patent Publication No. 20030081554 to Huang et al. (“Huang”).

A. Claims 18 and 20-29

With respect to claims 18 and 20-29, a first *clear error in the Examiner’s rejection* is a failure to identify how either the Gemelli or Huang, either alone or in combination, teach or suggest a step of, “comparing the compressed destination address identifier with forwarding addresses available for routing” as set forth in independent claim 18.

In addition, a second *clear error* in the Examiner’s rejection is a failure to identify how Gemelli or Huang, either alone or in combination, the step of “compressing the destination address identifier using a compression algorithm”, combined with “...forwarding [that] addresses have been compressed using the compression algorithm”. In other words, the Examiner has not identified a modification of Gemelli that results in using the *same* compression algorithm for a *destination address* and a *forwarding address*.

1. Gemelli Does Not Teach the Claimed Comparison

Applicant respectfully submits that neither Gemelli nor Huang teach the limitation of “comparing the compressed destination address identifier with forwarding addresses available for routing” as set forth in independent claim 18. In the rejection of claim 18 (and others), the Examiner has relied exclusively on Gemelli, and not Huang, as teaching the claimed *comparison* between a compressed destination address identifier and compressed forwarding

addresses. In support of the rejection, the Examiner refers to col. 1, lines 52-57 of Gemelli, which describes that the network prefix contained in an IP address should be considered in order to search in a forwarding table using the network prefix as its key. However, applicants respectfully note that this passage of Gemelli does not refer to a “*comparison*”, much less a comparison between a compressed destination address and compressed forwarding addresses. Instead, this passage of Gemelli only generally refers to *searching* in the forwarding table using the network prefix as a key.

Contrary to the Examiner’s allegation, a search is not the same as a comparison. Specifically, Gemelli leaves open in which way the search is to be carried out, and certainly does not imply that it is carried out by *comparing*. In fact, the act of carrying out a search using a key does not require that the key is *compared* to other entities. Indeed, it is possible to use any search procedures, such as Hashing-based techniques, which avoid any comparison between the key and other entities. Accordingly, Gemelli does not teach a search which involves *comparing* the network prefix to other entities, but instead merely refers to the result of a search procedure which is the best matching routing address (see, e.g., column 7, lines 50-52 of Gemelli).

As a consequence, Gemelli fails to disclose “comparing the compressed destination address identifier with forwarding addresses available for routing” as set forth in independent claim 18. Thus, a clear error in the rejection of claim 18 is in alleging that Gemelli teaches the comparing step as claimed.

2. Neither Reference Teaches Using the Same Compression Algorithm on a Destination Address and a Forwarding Address

In the Final Office Action, the Examiner admitted that Gemelli fails to teach that the forwarding addresses have been compressed using the compression algorithm, and stored as entries of a routing table. (See Final Office Action at p.4, lines 8-10). However, the Examiner has argued that Huang teaches this limitation. Applicants respectfully submit that that Huang does not teach this limitation, nor does a modification of Gemelli per the teachings of Huang.

In particular, the Examiner has not identified how the teachings of Huang would modify Gemelli such that the compression algorithm of the destination address and the forwarding address would be the same. In fact, the only modification of Gemelli alleged by the Examiner is to compress the forwarding addresses.

It would have been obvious to one of ordinary skill in the art at the time the invention was made to Gemelli et al. by compressing the forwarding address to occupy less memory space, which is smaller than the forwarding table. (Huang et al., Paragraph 7, page 1).

(Final Office Action at p.4). Nothing in that paragraph mentions that one would use the *same* compression method for the destination address and the forwarding address. The Advisory Action similarly fails to specify a modification of Gemelli that would involve using the same compression method for the destination address and the forwarding address.

For this reason alone, it is respectfully submitted that there is clear error in the rejection of claim 18.

3. Conclusion as to Claims 18 and 20-29

For the foregoing reasons, there are multiple clear errors in the rejection of claim 18. These errors apply equally to dependent claims 20-29.

B. Claims 30-37

Independent claims 30 and 36 include limitation analogous to those discussed above in connection with claim 18. Accordingly, the same clear errors exist in the final rejection of claims 30 and 36. Moreover, dependent claims 31-35 and 37 all depend from and incorporate all the limitations of one of independent claims 30 or 36. The same clear errors exist in the final rejection of those claims as well.

II. Conclusion

For all of the foregoing reasons, it is respectfully submitted that the application is in a condition for allowance.

Respectfully Submitted,

A handwritten signature in black ink, appearing to be 'H. C. Moore', written over a horizontal line.

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